

ATTACHMENT 4
EVIDENCE OF HYDRAULIC OVERLOAD



9439735



JOHN RAY HARRISON
MAYOR

CITY OF PASADENA

July 31, 1992

Helen
1 - [unclear]
2 - AD [unclear]
3 - DMP's
4 - Via Sum [unclear]
5 - NCR
6 - [unclear]
7 - [unclear]
8 - [unclear]
9 - [unclear]

Ms. Helen Nguyen (6W-EAT)
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Administrative Order Docket No. VI-92-0282
NPDES Permit Nos. TX0047881, TX0047872, and TX0063410

Dear Ms. Nguyen:

Vince Bayou WWTP: NPDES No. TX0063410

1. At present the City of Pasadena is in receipt of a study conducted by Sparks & Barlow Eng. A review of this study is currently being conducted.
2. Infiltration causing by-passing occurred due to prolonged periods of unusually heavy rainfall and saturated ground conditions. By-passing at the Vince Bayou Plant has only occurred once and this was due to a prolonged period of heavy rains. The plant was full, the retention pond was full and Gulf Coast Waste Disposal Authority Plant was operating at full capacity.
3. Non-compliance for total suspended solids daily average were due to the digester and west clarifier being out of service for repairs.

November, 1991 - Gear Box on Digester Failed.
January, 1992 - Digester Gear Box repaired and placed back in service with less than 100% efficiency.
March 16, 1992 - Digester operating at 100% efficiency.
January 1, 1992 - West clarifier out of service.
January 4, 1992 - West clarifier back in service.
April 28, 1992 - West clarifier out of service
May 3, 1992 - West clarifier back in service.

All repairs have been completed.

P O BOX 672

PASADENA TX 77501

(713) 477-1511

04/24/2013 TCEQ

Page Two (2)
Ms. Helen Nguyen (6W-EAT)
July 31, 1992

Deepwater WWTP: NPDES No. TX0047872

1. By-passing was caused by recent period of heavy rainfall.
2. The staff gauge measurement device has been repositioned away from the weir crest to allow accurate measurement. The sonk sending unit has been remounted.

Golden Acres WWTP: NPDES No. TX0047881

1. By-passing has been caused by recent periods of heavy rainfall and the inability of the effluent line to handle the increased flow. A new effluent line is currently under construction and additional pumping units are being installed.
2. A staff gauge has been installed to manually check the flow.
3. A new fan has been installed in the chlorine room.

Deepwater Laboratory:

1. The GGA standards were revised recently in the Standard Methods for the Examination of Water and Wastewater, 17th Edition. The correct GGA standards are now being used.

Yours truly,



E. Bert Simmons, P.E.
Director of Public Works

EBS/EG/RH/lb

cc: Mayor John Ray Harrison
Earl Goings
Richard Haynes

199903

TCEQ Compliance Investigation 4-20-99

SUMMARY OF INSPECTION FINDINGS

Entity: City of Pasadena - Vince Bayou WWTP	WQ Permit No. 0010053 - 005	Inspection Date: 9/1/99
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OUTSTANDING ALLEGED VIOLATIONS

No.	Requirement(s) Cited	Description of Alleged Violation, Corrective Action Recommendation, and Compliance Documentation	Compliance Due Date
1	30 TAC 305.126 and Final Effluent Limitations, page 2 of Permit No. 10053-005.	<p><u>Infiltration/Inflow (I/I) :</u></p> <p>Flows to the plant increase after rainfall events, indicating the presence of Infiltration & Inflow (I/I) into the collection system. During the 30 month review period (1/97 - 6/99), the documented daily average flows (DAF's) exceeded 90% of the permitted 7.0 MGD DAF for 6 months, and exceeded the permitted 7.0 MGD value for the other 24 months. Every effort must be made to reduce or eliminate the sources of I/I into the collection system.</p> <p><u>Compliance Evaluation :</u> Submit a compliance schedule with plans for actions to reduce I/I into the collection system.</p>	30 days.
2	30 TAC 305.21-.30, 26.12, and Permit No. 10053-005, Permit Conditions, 2g, page 6.	<p><u>Unauthorized Discharges (UD) :</u></p> <p>During the 30 month review period (1/97 - 6/99), numerous collection system overflows were documented. Every effort must be made to reduce or eliminate all overflows and unauthorized discharges.</p> <p><u>Compliance Evaluation :</u> Submit a compliance schedule with plans for actions to reduce or eliminate collection system overflows.</p>	30 days
3	Permit No 10053-005, Page 2, Final Permit Limitations	<p><u>Region-Documented Effluent Quality (RE) :</u></p> <p>A 24 hour composite sample was collected by the permittee for this inspection. Lab results indicated violations of the Carbonaceous Biochemical Oxygen Demand (CBOD) and Total Suspended Solids (TSS) daily maximum limits of 25 and 40 mg/l, respectively. The sample CBOD value was 32 mg/l and the sample TSS value was 96 mg/l. Every effort must be made to comply with all aspects of the permit.</p> <p><u>Compliance Evaluation :</u> Submit a compliance schedule with plans for actions which will enable the facility to comply with all permitted final effluent limitations.</p>	30 days.

ALLEGED NONCOMPLIANCES NOTED AND RESOLVED

No.	Requirement(s) Cited	Description of Alleged Noncompliance, Corrective Action Taken, and Compliance Documentation
1	30 TAC 305.126 and Final Effluent Limitations, Page 2 of Permit No. 10053-005.	<p><u>Compliance with Flow Limits (FL) :</u></p> <p>Note that during the 30 month review period (1/97 - 6/99), the documented daily average flows exceeded the permitted 7.0 MGD value for 24 months. As noted in the first paragraph of Section J (above), in order to address this issue, land has been acquired by the City for a new WWTP, and the plans and specs for the 14-15 MGD facility are in Austin for approval.</p>

Notice of Excursion(s)

Plant Name: *Vince Bayou WWTP*
Report Date: *18-Jun-01*

TPDES #: *WQ0010053-005*
EPA #: *TX0063410*

EXCURSION(S)

Parameter	Parameter	Sample Date	Exceedance	Regulatory Limit	Exceedance
TSS	Dly Max (mg/L)	6/11/01		73.0	40.0

EXPLANATION

Rainfall (30" estimated) between 6/5 and 6/9 caused excessive flows and hydraulic overloads in the clarifiers. As a result, higher concentrations of solids exited the clarifier weirs.

CORRECTIVE ACTION

The City of Pasadena is repairing broken sewer lines in an effort to reduce inflow and infiltration during rainstorms.

CONTACTS

Greg Jalowy, Chief Operator (713) 477-9108
Richard Neely, Asst. Manager (713) 477-5856

Notice of Excursion(s)

Plant Name: *Vince Bayou WWTP*
Report Date: *17-Jul-01*

TPDES #: *WQ0010053-005*
EPA #: *TX0063410*

EXCURSION(S)

Effluent Characteristic	Parameter	Start Date	End Date	Reasoned Value	Permitted Value
Flow	Dly Avg (MGD)	6/1/01	6/30/01	8.667	7.0
Flow	Annual Avg (MGD)	7/1/00	6/30/01	7.188	7.0
TSS	Dly Max (mg/L)	6/11/01		73.0	40.0
TSS	Dly Avg (lbs/day)	6/1/01	6/30/01	964.6	876.0

EXPLANATION

Rainfall (30" estimated) between 6/5 and 6/9 caused excessive flows and hydraulic overloads in the clarifiers. As a result, higher concentrations of solids exited the clarifier weirs due to a higher than normal monthly average flow.

CORRECTIVE ACTION

The City of Pasadena is repairing broken sewer lines in an effort to reduce inflow and infiltration during rainstorms.

CONTACTS

Greg Jalowy, Chief Operator (713) 477-9108
Richard Neely, Asst. Manager (713) 477-5856

Memo

Date: May 16, 2002

Subject: Unresolved violation for Vince Bayou WWTP (Item 2 from Sep 5, 2001 inspection)

To: Jim Wickizer, Erwin Burden
Allan Teague
Rick Bryant
Mike McGill
Andy Helms
Earl Goings at Severn Trent Environmental Services

From: Sam

We have received a notification from TNRCC that we are still unresolved on item 2 from the inspection Sep 5, 2001.

This item addressed I/I, compliance with flow limits, and unauthorized discharges. It cited exceedances in our peak flow limit on specific dates from Nov 2000 thru Sep 2001. It lists 42 separate SSOs, (26 of which contributed to the overflow) from Jan 2000 through Sep 2001. Then tells us we must take immediate steps to become compliant with flow limits and develop a program, which prevents all existing and potential sources of overflows. It asks us to submit steps that have been taken and will be taken to become compliant with a schedule. This should include a comprehensive program to evaluate the condition of the sanitary sewer, determine the method of system rehabilitation and develop a design and construction program to achieve compliance.

To draft a response I need some data from you. Obviously they want more than the paragraph I already sent them.

1. Data on the new plant, which shows how the VB plant will be replaced by something better regarding flow and speaks to overflow during high water conditions. I just know we are accommodating high flow in our new plant, right? Especially the part where we send part of our flow to Gulf Coast Waste, right? And the detention pond, right? Also the lift stations we are constructing to address overflow conditions? I need a construction schedule with a completion and on-line predicted date.
2. How many lines have we TV'd since Jan 2000? How much do we do each month, or week, and what is our normal rate of replacement? How much \$ are we spending on this, so they'll know we're serious? Do we have more crews and equipment planned to be able to do more at some point in time? How do we plan to operate so we have a continuous evaluation in operation so we know how to prioritize our replacement/repair/restoration?
3. How much pipe bursting has been done since Jan 2000? How much money do we spend on this? How much do we do each week? Are we adding equip and crews to grow the pipe bursting capability? Do we still replace lines the old way? How do we determine what lines in what priority to replace? Are our priorities for replacement based on customer complaints or TV eval?
4. Do we actually have data that shows what benefit we derive from the added lift stations? What is their schedule for construction? How much money are we spending on this?
5. Should I address "city works" software and explain the exact benefit to our Sanitary Sewer repair/replacement program? How much money are we spending on this?

Our response is due back by 14 June so we can't drag our feet on this. I need your info to me by June 5. I need to make this look like we have an actual program, not just a bunch of unrelated projects.

I've attached the letter and violation from TNRCC so if you think of something that will help in the response, please let me know.

Notice of Excursion(s)

Plant Name: *Vince Bayou WWTP*
Report Date: *14-Jun-02*

TPDES #: *WQ0010053-005*
EPA #: *TX0063410*

EXCURSION(S)

Effluent Characteristic	Parameter	Start Date	End Date	Reported Value	Permitted Value
<i>Flow</i>	<i>2-Hr Peak (gpm)</i>	<i>5/18/02</i>		<i>10000</i>	<i>9722</i>
<i>Flow</i>	<i>Annual Avg (MGD)</i>	<i>6/1/01</i>	<i>5/31/02</i>	<i>7.5</i>	<i>7.0</i>

EXPLANATION

Inflow and infiltration due to 4.2" of rainfall on 5/17 and 5/18/02 caused plant flow to increase.

CORRECTIVE ACTION

The City of Pasadena is repairing broken sewer lines in an effort to reduce inflow and infiltration during rainstorms.

CONTACTS

Greg Jalowy, Chief Operator (713) 477-9108
Richard Neely, Asst. Manager (713) 477-5856

From: Rick Neely <RickN@stes.com>
To: "Sara Metzger (E-mail)" <SMetzger@ci.pasadena.tx.us>
Date: 6/3/02 2:37PM
Subject: Vince Bayou WWTP - Notice of Enforcement Action

Hi Sara.

Attached is the letter I composed to answer the TNRCC's Notice of Enforcement Action (dated 5/17/02) for the Vince Bayou plant. Please look it over and let me know what you think since I refer to actions the City is taking to eliminate grease and I & I in the sanitary sewer system. In the letter I refer to an e-mail you sent out Monday morning concerning a "Grease Improvement Team". If it's OK with you I would like to attach the e-mail (or if you would like to write a more official-looking letter) to my letter.

Please read the attached letter and let me know what you think. Once we agree upon the contents I can either send the letter to the TNRCC or let you use it and it's attachments with a letter that you compose. Only reason that I bring this up is because the TNRCC letter is addressed to the Mayor. I will be more than happy to send it myself.

Call or e-mail me when you have a moment.

Richard Neely
Asst Mgr - Pasadena Project
Severn Trent Services, Inc.
713-477-5856 office
713-204-2147 cell
713-919-4149 pager



John Manlove, Mayor

July 2, 2002

Elizabeth W. Sears
Team Leader
Water Quality Management
Region 12 Houston
5425 Polk Ave. Ste. H
Houston, Texas 77023-1486

Regarding Unresolved Alleged Violations for Compliance Evaluation Investigation at:
City of Pasadena Vince Bayou Wastewater Treatment Plant, Pasadena, Harris County, Texas
TNRCC Permit No. 10053-005, EPA ID No. TX0063410 letter dated May 14, 2002.

The compliance plan to address the violation is attached.

Sincerely,

Erwin Burden, P.E.
Acting Director of Public Works



Compliance Plan for Infiltration/Inflow (I/I), Compliance with Flow Limits, & Unauthorized Discharges:

Vince Bayou Waste Water Treatment Plant Replacement

The current Vince Bayou Wastewater Treatment Plant is being replaced by the new Vince Bayou Wastewater Treatment Plant. The new plant has increased capacity and flow limits. Construction of the new plant is nearing the final phases and is due for completion in October 2002. The overflow conditions at the current Vince Bayou WWTP are expected to be eliminated when the new plant comes on line. This new plant will also replace the Deepwater WWTP.

In addition, the plan calls for any overflow to be detained for processing by Gulf Coast Waste Disposal Authority by regulating flow through a detention pond specifically designed for that purpose.

The force mains to provide service to the new plant are nearing construction completion. The 24" line servicing the Deepwater WWTP customers will be complete August 2002.

In addition, there are two new lift stations, West Pitts and Main, planned with larger capacity to handle overflow conditions. The lift stations schedule for construction is as follows: Design complete in August, Bid complete in September, Construction Start in October 2002, with construction complete in May 2003.

Line Inspection

In 1985 the city purchased a TV truck to assist in repairing blockages, broken lines, and discovering trouble spots in the sanitary sewer lines. Since beginning service, the truck has operated with a crew of three on a daily basis. During normal operation, the TV truck covers approximately 800 feet of sewer line per week. Based on the success gained with this operation, the city purchased another TV truck in 2000 and two more in 2002. We have increased and updated our operational capability for TV line inspection.

We have initiated a proactive program based on the "Certificate of Occupancy" required to occupy a facility. The TV trucks are used to inspect the sanitary sewer and drainage lines prior to occupancy so that any sanitary sewer or drainage problems are cleared before they have impact.

In addition, smoke testing is used to locate leaks and breaks so they can be repaired.

Pipe Bursting Line Replacement

Since 1985, approximately 100 miles (of the total of 400 miles) of city main line has been replaced.

In 1998 the city purchased the pipe bursting equipment to replace aging sewer lines. Since the equipment was purchased and put into operation, approximately 16 miles of sanitary sewer line

has been replaced using this technology. This work has been planned and prioritized based on the TV inspection and customer complaints. In 2002 the city purchased a second full set of pipe bursting equipment and using the point repair crew on a part time basis, performs point and section repairs in emergency situations so that the main pipe bursting crew can continue to accomplish the planned schedule they are working toward. Once the second pipe bursting equipment is fully staffed, we are projecting 6-10 miles of replacement per year using the pipe bursting equipment.

Sanitary Sewer Main Line Repair

Normal operation of city sanitary repair crews continues with receipt of customer complaints and location of problems by the sanitary sewer maintenance crews. This operation involves point repairs of problem blockages, cave-ins, and damaged lines. Two three-man crews operate from 7 am to 3:30 pm each weekday, with a relief crew that works till 7 pm on point repairs. A standby crew is on-call for emergency repairs on weekends and holidays.

Trunk Line Replacement

In the current Five Year Plan we are budgeting to replace approximately ½ of our trunk lines at approximately \$11M. In our trunk line replacement we are selecting pipe materials that meet or exceed a 50 year design life. At the current time the Strawberry trunk line is being replaced since it continually suffers cave-ins due to the age of the line. The plans for this line are as follows:

Redesign complete by August 2002
Bid construction by October 2002
Construction start December 2002
Construction completion (for first \$5M) December 2003

Street and Infrastructure Replacement

The city is replacing older streets in priority order. When these streets are replaced, the entire infrastructure is replaced. This includes sewer, water, and drainage.

- Over the last five years, the following streets have been replaced including infrastructure.

Queens
Houston
Munger/Johnson
James

Mobile Phase I
Burke
Camille
Jackson (expected completion Sep 2002)

- Currently, the following streets and infrastructure are scheduled for replacement:

<u>Street</u>	<u>Design complete</u>	<u>Bid</u>	<u>Start construction</u>	<u>Construction complete</u>
Witter	complete	Jul 02	Aug 02	Jan 03
Alastair	Jul 02	Aug 02	Sep 02	Mar 03
Mobile Ph II	complete	Jul 02	Aug 02	Feb 03
Deepwater	complete	Jul 02	Aug 02	Feb 02
Strawberry	Aug 02	Sep 02	Oct 02	May 03
Pasadena Blvd	Oct 02	Nov 02	Jan 03	Jun 03

Software/Database Tool

In addition to these hardware and construction intensive programs, the city is purchasing the software "City Works", a \$300,000 investment, within the year 2002. This software offers several capabilities to assist in sanitary sewer service such as:

- Locating persistent trouble spots
- Progress of sewer line replacement
- Locating customer complaints
- Sewer leakage/infiltration
- Health department actions for pretreatment
- Sanitary sewer leakage into storm sewers

In addition, we are expanding our SCADA system, which will show the rain totals in the WWTP watershed. Several of our lift stations have been, or are being, implemented with a SCADA system to measure the amount of rainfall at various locations in the city. This will enable us to compare the rainfall amount in the WWTP watershed with flow from the plant. As this data is available, we will report results so the effectiveness of our programs in controlling infiltration can be quantified.

It should be clear that the city is committed to provide the best service possible to the citizens and as time and money permits, the city is aggressively pursuing the I/I problem, flow limit problem and unauthorized discharge problem.

Memo

Date: Sep 4, 2002

Subject: \$5000 fine from TNRCC for high Total Suspended Solids (TSS) at Vince Bayou WWTP in Feb and June 2001.

To: Jim Wickizer
Earl Goings at Severn Trent Environmental Services

From: Sam

We have received a settlement offer of \$5000 for two TSS violations at Vince Bayou WWTP in Feb and Jun 2001.

I have attached to this memo all of the pertinent and previous communications regarding this violation. Obviously, we were unable to satisfy TNRCC with our earlier responses.

I cannot think of a way to answer the original violation other than what we have already sent them.

Suggest we pay the fine and stop trying to fight it. Note that the Feb 01 violation occurred in drought conditions (grease is problematic with low flow) and the Jun 01 violation occurred at Allison (35" of rainfall).

VB WWTP is about 20-30 years overdue for replacement. We are lucky it is still operational. Hope you can influence the progress of the new plant. There will be many more violations of this nature if the old plant is used very much longer.

Item 1. The original letter from TNRCC noting the violation of TSS for Feb and Jun 2001. This was outgrowth of Sep 5 inspection at VB WWTP.

Item 2. My internal memo requesting info regarding the measures we are taking for compliance.

Item 3. The City's response to TNRCC including the letter from ST that we attached.

Item 4. E-mail from ST regarding the violation.

Item 5. Fax from ST detailing each excursions and their explanation.

Item 6. The City's response to a different part of TNRCC concerned with I&I, but relating to the TSS problem.

Item 7. The latest letter from TNRCC offering a \$5000 settlement for the two TSS violations.

Please note that I have exhausted my resources to answer or clear this violation. Please don't convince yourselves that I can clear this up with another letter. It is way past that stage.

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 13, 2002

Erwin Burden, P.E.
Acting Director of Public Works
City of Pasadena
P.O. Box 672
Pasadena, Texas 77501

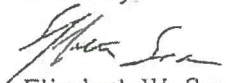
Re: Acceptance of Compliance Plan for: City of Pasadena Vince Bayou Wastewater Treatment Plant,
Pasadena, Harris County, Texas
TNRCC Permit No. 10053-005, EPA ID No. TX0063410

Dear Mr. Burden:

The Texas Natural Resource Conservation Commission (TNRCC) Houston Region Office received a compliance plan that you submitted on July 2, 2002 for alleged violation No. 2 noted during the September 5, 2001 investigation of the above-referenced facility. The TNRCC Houston Region Office has completed a review of the compliance plan for resolving alleged violation No. 2 dealing with infiltration and inflow (I/I) and unauthorized discharges. The compliance plan appears to identify necessary corrective action for the alleged violation. We will monitor your progress in implementing the corrective action. You should submit quarterly written updates to our office, beginning October 15, 2002, demonstrating that progress is being made to resolve the alleged violation. Please be advised, though, that if we determine during follow-up monitoring that you are not working towards compliance, or that the problem has escalated, further enforcement action will be considered.

The Texas Natural Resource Conservation Commission appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Pentecost in the Houston Region Office at 713/767-3667.

Sincerely,


Elizabeth W. Sears
Team Leader
Water Quality Division
Region 12 Houston

EWS/ssp/lb

cc: The Honorable John Manlove, Mayor of Pasadena, City of Pasadena, P.O. Box 672, Pasadena, Texas 77501

REPLY TO: REGION 12 • 5425 POLK AVENUE, STE. H • HOUSTON, TEXAS 77023-1486 • 713/767-3500

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tnrcc.state.tx.us

Severn Trent Services, Inc.
Water Quality Non-Compliance Notification

11WD/10053-005/00

☐ Unauthorized Discharge

☒ Reportable Effluent Violation

☐ Other

General Information

Entity Name: Vince Bayou WWTP - City of Pasadena, TX

Telephone: 713-477-5856

☒ Permittee ☐ Subscriber

TCEQ Region: 12

County: Harris

Permit Number*: TCEQ: 10053-005 EPA: TX0063410

Non-compliance Summary

Description of Non-compliance (include location, discharge route, and estimated volume if an unauthorized discharge):

Effluent Characteristic	Parameter	Start Date	End Date	Reported Value	Permitted Limit
CBOD	30d Avg (lbs/day)	2/1/03	2/28/03	662.4	584.0
CBOD	7d Avg (mg/L)	2/23/03	3/1/03	30.7	15.0
CBOD	Dly Max (mg/L)	2/22/03	2/22/03	29.0	25.0
CBOD	Dly Max (mg/L)	2/23/03	2/23/03	35.3	25.0
CBOD	Dly Max (mg/L)	2/28/03	2/28/03	36.7	25.0
TSS	7d Avg (mg/L)	2/23/03	3/1/03	29.7	25.0
TSS	Dly Max (mg/L)	2/28/03	2/28/03	40.5	40.0

Cause of Non-compliance:

On 2/20/03 the west clarifier rake gearbox failed. While attempting to isolate the clarifier, the clarifier influent gate also failed. Flow to the clarifier continued, causing a buildup of solids due to the rake failure. To fix the clarifier influent gate, flow to both clarifiers needed to be diverted. Rainfall of 1.3" during the two days following the 20th delayed the diversion and caused a hydraulic overload in the west clarifier, forcing solids over the effluent weir.

Duration: Start Date and Time: See explanation above.

End Date and Time:

Or Date Expected to be Corrected:

Potential Danger to Human Health and Safety or the Environment:

Actions Taken

Monitoring Data: Data should be attached or submitted to TCEQ when available.

☐ Yes ☒ No Field Measurements

☐ Yes ☒ No Laboratory Samples

☐ Yes ☒ No Fish Kill (If yes, estimate number killed):

Actions Taken to Mitigate Adverse Effects:

ENFORCEMENT DIVISION

RECEIVED
MAR 25 2003

Texas Commission on Environmental Quality

Investigation Report

CITY OF PASADENA

VINCE BAYOU PLANT

RN101609584

Investigation # 262262

Incident #

Investigator: MARY STYGAR

Site Classification

DOMESTIC MAJOR

Conducted: 02/06/2004 -- 02/06/2004

No Industry Code Assigned

Program(s): WASTEWATER

Investigation Type : Compliance Invest File Review Location :

Additional ID(s) : TPDES0063410
WQ0010053005

Address: ; ,

Activity Type : WW FRR - Record review

Principal(s) :

Role	Name
RESPONDENT	CITY OF PASADENA

Contact(s) :

Role	Title	Name	Phone
Notified	ENVIRONMENTAL COMPLIANCE MANAGER	MR JAMES WOLFE	Work (281) 578-4263 Cell (281) 960-6847 Fax (281) 578-4287
Participated in Investigation	ENVIRONMENTAL COMPLIANCE MANAGER	MR JAMES WOLFE	Work (281) 578-4263 Cell (281) 960-6847 Fax (281) 578-4287
Participated in Investigation	CHIEF OPERATOR	MR GREG JALOWY	Work (713) 477-5856
Participated in Investigation	ASSISTANT PROJECT MANAGER	MR RICHARD NEELY	Work (713) 477-5856 Other (713) 919-4149 Fax (713) 475-0501 Cell (713) 204-2147
Regulated Entity Contact	MAYOR	MR JOHN MANLOVE	Work (713) 477-1511

Other Staff Member(s) :

Role	Name
SUPERVISOR	ELIZABETH SEARS
QA REVIEWER	STACY PENTECOST

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
WQ INVESTIGATION TYPES FY04	vince bayou act
GENERIC OTHER ISSUES AND/OR VIOLATIONS	vince bayou gen

Investigation Comments :

This file review was conducted to resolve the outstanding alleged violations from Investigation No. 254576.

ALLEGED NONCOMPLIANCES NOTED AND RESOLVED

Track No: 148700

Resolution Date: 2/6/04

2D TWC Chapter 26.121**Alleged Violation:**

Investigation: 254576

Comment Date: 12/03/2003

During the twelve months prior to the investigation, there were 20 unauthorized discharges that were caused by either wet weather, plugs in the line, or equipment failure. See attached table. Dry weather sanitary sewer overflows (SSOs) from the collection system and SSOs from the collection system due to Infiltration and Inflow (I/I) are not authorized. While it may not be possible to preclude all sanitary sewer overflows resulting from acts of vandalism or unavoidable system failures, permittees are expected to prevent all other dry weather SSOs. Permittees are required to develop and implement a preventative maintenance program which prevents dry weather overflows. In addition, permittees with wet weather SSO problems within the collection system shall develop and implement a program to address all existing and potential sources of overflows.

Investigation: 262262

Comment Date: 02/06/2004

See description for violation Tracking No. 148700.

Recommended Corrective Action: It is understood that the permittee is adhering to a compliance plan concerning the wet weather sanitary sewer overflows (SSOs). Continue to submit quarterly progress reports with updates on collection system improvements. In addition, submit to this office a comprehensive plan for a preventative maintenance program within the collection system in order to prevent dry weather SSOs.

Resolution: On 01/20/2004 the permittee submitted documentation indicating that a comprehensive plan is actively being worked on for a preventative maintenance program within the collection system in order to prevent dry weather sanitary sewer overflows (SSO).

Track No: 148872

Resolution Date: 2/6/04

2D TWC Chapter 26.121

30 TAC Chapter 305.125(1)

Alleged Violation:

Investigation: 254576

Comment Date: 12/11/2003

The grab sample collected during the inspection was noncompliant for ammonia nitrogen. The sample measured 17.1 mg/L and the permit requires the grab sample for ammonia nitrogen to be at or below 15 mg/L. In addition, the self-reported effluent data indicated that the ammonia nitrogen samples were noncompliant for the majority of the samples collected (see Table 1). The proposed agreed order, docket no. 2003-1017-MWD-E, includes ammonia violations through July 2003. As such, the attached table of violations includes data only from August, September and October of 2003. Every effort must be made to maintain compliance with all permitted effluent limits.

Investigation: 262262

Comment Date: 02/06/2004

See description for violation Tracking No. 148872

Recommended Corrective Action: Submit documentation of the actions taken to comply with the permit limits.

Resolution: On 01/15/2004 the permittee submitted notification that construction of the new Vince Bayou Wastewater Treatment Plant (WWTP) was completed with a discharge expected to begin on 01/16/2004. The effluent from the old Vince Bayou WWTP is being received by the new Vince Bayou WWTP until the old plant is decommissioned. The permittee stated that the new Vince Bayou WWTP has the capacity to treat ammonia nitrogen, and thus permit limits will be met for this parameter.

Track No: 148935

Resolution Date: 2/6/04

PERMIT Permit Conditions, Page 7, No. 1a

Alleged Violation:

Investigation: 254576

Comment Date: 12/05/2003

At the time of the investigation, it was noted that the number of permit excursions were not reported on the Discharge Monitoring Reports (DMRs) for August and September of 2003. The number of excursions for daily maximum, daily minimum, and 7-day average must be entered in the excursion column on the DMRs.

Investigation: 262262

Comment Date: 02/06/2004

See description for violation Tracking No. 148935.

Recommended Corrective Action: Submit corrected DMRs to the TCEQ Region 12 Office and the Water Quality Compliance Monitoring Team of the Enforcement Division.

Resolution: On 01/20/2004 the permittee submitted corrected DMRs to the TCEQ Region 12 Office and the Water Quality Compliance Monitoring Team of the Enforcement Division.

Signed

Mary L. Styer
Environmental Investigator

Date

2-06-04

Signed

[Signature]
Supervisor

Date

2-9-04

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☐ Maps, Plans, Sketches

☒ Letter to Facility (specify type) : _____

☐ Photographs

Investigation Report

☒ Correspondence from the facility

☐ Sample Analysis Results

☐ Other (specify) : _____

☐ Manifests

☐ NOR

Pasadena uses new wastewater treatment mode

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Years after being slapped with lawsuits and fines over its dilapidated sewer plants, the city of Pasadena is operating a new \$16 million high-tech wastewater treatment system capable of handling more than two of the city's current sewer plants combined.

The new Vince Bayou plant at 209 W. Main makes Pasadena one of a handful of municipalities converting to ultraviolet technology to disinfect wastewater.

Less than 25 percent of all wastewater treatment plants in the United States are utilizing this cost-saving, effective method of disinfection, said Rebecca Becerra, a spokeswoman for the city.

"Chlorine is the traditional form of disinfection because of its relative low costs and competence, but it can create problems with chemical handling, storage and organic interactions forming chlorine-produced oxidants," said Robin Green, the city's director of public works.

In the city's other sewer plants, chlorine is dropped into the water to disinfect. Another chemical then has to be added to dechlorinate the water. The process, though safe, can leave residue and other contaminants.

The new ultraviolet treatment is an economical alternative because it diminishes costs for power, labor, parts, chemicals and overall operation and maintenance, he said.

With the new process, no harsh chemicals are being added to the water since ultraviolet technology uses a physical reaction to disinfect wastewater rather than a chemical reaction, Green said.

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The ultraviolet process disinfects the water by using an ultraviolet light that kills everything and leaves no residue, Becerra said.

"That's why we're so excited about this. It far exceeds environmental standards," she said.

The treated water released from the Pasadena plant eventually flows in the Houston Ship Channel and Galveston Bay. The water being released from the new plant will be cleaner, Green said.

He pointed out that a recent San Francisco study found that ultraviolet treatment killed bacteria as well as chlorination does and was more effective than the traditional methods of disinfection.

In the late 1980s, the city was fined by the U.S. Environmental Protection Agency, which contended that sewage was polluting Vince Bayou from the city's Vince Bayou and Deepwater wastewater treatment plants.

The state attorney general's office also fined the city over its polluting sewer plants.

Each agency sought \$160,000 in fines.

The city's other two plants, the 56-year-old Deepwater facility at 3516 La Porte Freeway and the Old Vince Bayou plant at 213 McDonald, which is 50 years old, will eventually be decommissioned, Becerra said.

The two plants are permitted to handle a combined 11 million gallons per day. They will either be declared surplus property, which the city can then sell to a private entity, or the city may retain the facilities to hold in reserve for further treatment needs, she said.

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